

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHAD STANBRO,

Plaintiff,

-against-

WESTCHESTER COUNTY HEALTH
CARE CORPORATION, WESTCHESTER
MEDICAL CENTER, FRANK WEBER and
JOHN FULL,

Defendants.

7:19-cv-10857-KMK

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHAD STANBRO,

Plaintiff,

-against-

CORRECTION OFFICER NADYA PALOU,
CORRECTION OFFICER RAYMOND DEAL,
CORRECTION OFFICER KRISTOFER LEONARDO,
CORRECTION OFFICER RICHARD LANDRY,
CORRECTION NURSE GARY PAGLIARO and
CORRECTION SERGEANT ENRIQUE TORRES,

Defendants.

**NOTICE OF MOTIONS
IN LIMINE**

7:20-cv-01591-KMK

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PLEASE TAKE NOTICE that upon the accompanying memorandum of law and the Declaration of Jeb Harben, submitted herewith, defendants Leonardo, Landry, Pagliaro, and Torres, by their attorney LETITIA JAMES, the Attorney General of the State of New York, hereby moves for an order: (1) precluding materials concerning Plaintiff's grievances filed while in DOCCS custody as well as any other written statements by Plaintiff; (2) permitting defendant to cross-examine the plaintiff on his underlying criminal conviction; (3) precluding reference to DOCCS Directives and the DOCCS Employee Manual; (4) precluding attorney Edward Sivin from testifying; (5) precluding evidence of economic damages; (6) precluding references to use of force

based on Plaintiff's statements found in medical and other treatment records; (7) precluding reference to investigations by the District Attorney, New York State Police, and DOCCS Office of Special Investigations; (8) precluding medical illustrations (subject to further review); (9) precluding photographic and videographic evidence (subject to further review); and (10) precluding Plaintiff's state law claims.

Dated: New York, New York
June 6, 2022

LETITIA JAMES
Attorney General of the
State of New York
Attorney for Defendants Landry, Leonardo, Torres,
and Pagliaro

By: /s/Jeb Harben
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TO: Counsel of record (via ECF)